



the campaign for  
environmentally responsible  
health care

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**JUL 19 2004**

July 16, 2004

Dr. C. W. Jameson  
National Toxicology Program  
Report on Carcinogens  
79 Alexander Drive  
Building 4401, Room 3118  
P.O. Box 12233  
Research Triangle Park, NC 27709

Dear Dr. C.W. Jameson,

Attached please find a series of letters that Health Care Without Harm would like to submit for the record as public comment on the National Toxicology Program's Report on Carcinogens, Twelfth Edition. We are strongly opposed to the request to de-list Di (2-ethylhexyl) phthalate (DEHP) as "reasonably anticipated to be a carcinogen," based on the reclassification by IARC.

The IARC decision to downgrade DEHP to "not classifiable as to carcinogenicity to humans" was based on a flawed investigation that overlooked significant evidence of links to pancreatic tumors. Attached are several letters published in 2003 in the International Journal of Occupational and Environmental Health describing the flaws in the IARC DEHP evaluation. Furthermore, the letters show that IARC has been widely criticized for industry influence in its decisions to downgrade, with DEHP cited as a prime example.

To date, IARC has not responded to these concerns, and has not considered the evidence linking DEHP to pancreatic tumors. Therefore, in our view, the IARC listing cannot conscionably be used as a basis for making further decisions on DEHP.

Sincerely,

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is an international coalition of 437 organizations in 52 countries working to transform the health care industry so it is no longer a source of harm to people and the environment. See

**Please Note:** Due to Copyright Infringement Laws the letters to the editor and editorials referred to in Stacy Malkan's public comments cannot be publicly displayed. Listed below are the citations for these letters and editorials.

**Report on Carcinogens Group  
National Toxicology Program**

Brody, C., DiGangi, J., Easthope, T., Rossi, M., and Schettler, T. (2003) IARC Downgrading of DEHP. *Int J Occup Environ Health*, Vol. 9 (4): 399-400.

Melnick, R.L., Brody, C., DiGangi, J., and Huff, J. (2003) The IARC Evaluation of DEHP Excludes Key Papers Demonstrating Carcinogenic Effects. *Int J Occup Environ Health*, Vol. 9 (4): 400-402.

Huff, J. (2003) IARC and the DEHP Quagmire. *Int J Occup Environ Health*, Vol. 9 (4): 402-404.

Kleihues, P. (2003) Integrity of the Conduct of the IARC Monographs Program. *Int J Occup Environ Health*, Vol. 9 (1): 78.

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Tomatis, L. (2003) The IARC Must Maintain Its Important Role in the Protection of Public Health. *Int J Occup Environ Health*, Vol. 9 (1): 82.

Huff, J. (2003) Industry Influences IARC Carcinogenesis Evaluations. *Int J Occup Environ Health*, Vol. 9 (1): 83-84.

Melnick, R.L. (2003) Suppression of Crucial Information in the IARC Evaluation of DEHP. *Int J Occup Environ Health*, Vol. 9 (1) 84-85.

Mirer, F.E. (2003) Comment from the Union Participant in the IARC Working Group That Downgraded DEHP. *Int J Occup Environ Health*, Vol. 9 (1): 85-87.

Sass, J. (2003) Continued Insensitivity to Conflicts of Interest at IARC. *Int J Occup Environ Health*, Vol. 9 (1): 88-89.

Response by IARC (2003) *Int J Occup Environ Health*, Vol. 9 (1): 89.

Hooper, K. (2003) The IARC's Role in Public Health. *Int J Occup Environ Health*, Vol. 9 (1): 90.